

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

|                                     |   |                                     |
|-------------------------------------|---|-------------------------------------|
| <b>IN RE:</b>                       | ) |                                     |
|                                     | ) |                                     |
| <b>CUMMINGS MANOOKIAN, PLLC,</b>    | ) | <b>Case No. 3:19-bk-07235</b>       |
| <b>Debtor.</b>                      | ) | <b>Chapter 7</b>                    |
|                                     | ) | <b>Judge Walker</b>                 |
| <b>JEANNE ANN BURTON, TRUSTEE,</b>  | ) |                                     |
| <b>Plaintiff,</b>                   | ) |                                     |
|                                     | ) |                                     |
| <b>v.</b>                           | ) |                                     |
|                                     | ) |                                     |
| <b>HAGH LAW, PLLC; AFSOON HAGH;</b> | ) |                                     |
| <b>MANOOKIAN, PLLC; and FIRST-</b>  | ) |                                     |
| <b>CITIZENS BANK &amp; TRUST</b>    | ) |                                     |
| <b>COMPANY,</b>                     | ) |                                     |
| <b>Defendants.</b>                  | ) |                                     |
|                                     | ) | <b>Adv. Proc. No. 3:20-ap-90002</b> |

**AFFIDAVIT OF PHILLIP G. YOUNG, JR. REGARDING FEES ASSOCIATED WITH  
MOTIONS TO COMPEL DISCOVERY RESPONSES**

Phillip G. Young, Jr., being duly sworn, states as follows:

1. I am over eighteen years of age and have personal knowledge of the matters set forth herein.
2. I am an attorney licensed to practice law in the state of Tennessee and admitted to practice before all courts in the State of Tennessee. I am a member of Thompson Burton PLLC (the "Firm").
3. Thompson Burton, PLLC has been employed as special counsel for Jeanne Ann Burton, Trustee for the Debtor and Plaintiff herein.
4. On July 16, 2025, the Court granted the relief sought by the Trustee in the Motion to Compel Discovery Responses from Afsoon Hagh, Individually and on Behalf of Hagh Law, PLLC (Doc. 264) (the "Hagh Motion) and the Renewed Motion to Compel

Discovery Responses from Manookian, PLLC (Doc. 265) (the “Manookian Motion”).

The Court directed me to prepare and file this affidavit outlining the fees incurred in pursuing the Hagh Motion and the Manookian Motion, exclusive of any time spent on reply briefs related to those two motions.

5. I spent a total of 4.8 hours pursuing the Hagh Motion. Of that, 1.8 hours was spent reviewing past discovery responses, Ms. Hagh’s deposition transcript, and the docket in preparation for drafting the Hagh Motion. 1.6 hours was spent drafting the Hagh Motion. 0.8 hours was spent preparing for the hearing on the Hagh Motion, and 0.6 hours was spent traveling to and attending the hearing on the Hagh Motion.<sup>1</sup> At my hourly rate of \$575.00 per hour, that totals \$2,760.00 in fees incurred by Thompson Burton, PLLC in pursuit of the Hagh Motion.
6. I spent a total of 3.8 hours pursuing the Manookian Motion. Of that, 1.1 hours was spent reviewing past discovery responses and the docket in preparation for drafting the Manookian Motion. 1.4 hours was spent drafting the Manookian Motion. 0.7 hours was spent preparing for the hearing on the Manookian Motion, and 0.6 hours was spent traveling to and attending the hearing on the Manookian Motion. At my hourly rate of \$575.00 per hour, that totals \$2,185.00 in fees incurred by Thompson Burton, PLLC in pursuit of the Manookian Motion.
7. I omitted all time spent on the reply briefs (as instructed by the Court) and time spent pursuing the motion to compel related to Marty Fitzgerald.
8. Consistent with the Court’s findings and rulings, I believe that \$2,760.00 in fees should be charged to Afsoon Hagh and Hagh Law, PLLC, and \$2,185.00 to Manookian, PLLC.

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<sup>1</sup> For attendance at the hearing, I divided the total time of 1.8 hours evenly among all three motions that were heard that day.

FURTHER AFFIANT SAITH NOT.

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.

Thompson Burton, PLLC

6100 Tower Circle, Suite 200

Franklin, TN 37067

615-465-6008

[phillip@thompsonburton.com](mailto:phillip@thompsonburton.com)

Special Counsel for the Trustee